

Appendix D: Public Comments Received During Scoping

3 Rivers Comments Received Through E-mail (4/27/09 – 06/02/09)

Paul

Thank you for the email but the (W) Working paper work for three river will not open

Because what I see out there is that we need to open up the placer river with trails and bridges because there are some great fishing and hunting in there and the photo ops are great

That wood take some of the buses a way from portage creek , and its bad there and the climbers in the winter and the trash

you need to start daily fees on people

Frank Danford

ILL be up at bear camp at that time of the 27 th.

But a day fee of 10.00 or more , even a sliding scale on what there doing, is not that bad and it wood help clean up the place
the bus traffic is bad in the summer and in the winter you have the ice climbers and there trash.

this is a high traffic place for over night camper too , with the coming and going to wittier and anchorage

I will be fly out to camp in the morning and will not be back till the 1st. of June

Frank Danford

Dear Paul,
Thank you for sending me an announcement about the Three River Plan process.

My husband and I live in Girdwood, and we are quite concerned about the Twentymile River. We are unable to attend the meeting in May, so my comments reflect our thoughts on this river. I just feel more strongly and want to write. I have two primary concerns for the Twentymile drainage that are not mentioned in the working paper.

My first concern is pack rafters who hike up to Berry Pass, come down and float the Twentymile to the highway. These rafters must be protected from motorboats as they float. This is particularly important during silver salmon season. How you do this is beyond me, but there must be regulation for and protection of these people, especially once the back part of the trail is put in. It is/will be a world-class trip close to town and will only become more popular, hence even more dangerous.

My second concern is Carmen Creek and Lake. As you know, this creek has a good king salmon run; is full of Dolly Varden; and is quite small, twisty, and loaded with debris. The current situation is out of control. Both the fishery and the people who use this creek are at risk.

From what I have seen when we fish in June and early July, the main problem is commercial jet boats. These boats go up the creek very fast at least twice a day (more if they can get away with it); so the bank erosion from the large wakes, the disturbance of spawning kings, and the disruption of the creek bottom are detrimental to both Dollies and kings. This includes the lake outlet, which is small and full of boulders.

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There are far too many commercial runs per day on this creek already (jet boats, Andy Morrison's boat, and charters). And this does not include the private parties that go up this creek. However, jet boats have earned a bad reputation on this creek and should never have been allowed to begin operations there.

In terms of safety, there will be a head-on accident one day of boats in this creek. The twists and debris in the creek make it difficult to see ahead, and the noise of your motor makes it hard to hear another boat. There is no reliable system to know when another boat is coming, and the fishermen in the creek must get out when another boat comes. The wake alone is dangerous to a fisherman in the water.

Please heavily regulate this creek by limiting the number of permits to two or three per year and allowing the permitted company to go up only once per day. Have heavy fines for misuse, such as the immediate loss of the permit. And create a mandatory system for the companies to notify other users when their boat is coming up or down the creek.

Thank you for the opportunity to write. I am very interested in receiving any more information on the Forest Service's plans.

Sincerely,
Kate Sandberg

October 2, 2008

Dear Federal Land Manager:

The Citizens' Advisory Commission on Federal Areas is a 12 member organization re-established by the State of Alaska in 2007. The Commission opened its office in Fairbanks in mid-July of this year. Alaska Statute 41.37.220 directs the Commission to "consider, research, and hold hearings on the consistency with federal law and congressional intent on management, operation, planning, development, and additions to federal management areas in the state [and] on the effect of federal regulations and federal management decisions on the people of the state."

The original Commission operated from 1982 until 1999. During that time, we were involved extensively in the implementation of the Alaska National Interest Lands Conservation Act. The Commission participated in the planning efforts for the Alaskan conservation system units, national forest lands and other federal lands throughout the state.

Please add the Commission to your list of contacts. We also ask to be placed on your distribution list to receive notices of planning activities and opportunities for involvement, as well as copies of any documents, draft regulations or management policies released for public review. Please send everything to the following address:

Citizens' Advisory Commission on Federal Areas
3700 Airport Way
Fairbanks, AK 99709-4699

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Thank you for your attention to our request. Please contact me if you have questions or would like more information about the Commission. We look forward to again working with the federal land management agencies on these important issues.

Sincerely,

Stan Leaphart
Executive Director

Dear Mr. Clark,

A couple of quick questions about the three rivers management plan,.....

Is it my understanding that a plan will be implemented within 1 year (2010)?

Is there really only one public meeting on this issue,.....????? Why are these important meeting always scheduled when the commercial operators are most busy, gearing up for their seasons or mid-season?

I will comment via email after answers to the above questions.

Thank you

Ken Wilkinson
Wilkinson Expeditions

To whom it may concern,

I would like to make a few comments on how I use 20mile, Portage, and Placer Rivers. I frequently fish for silvers on 20-mile and Placer rivers during the fall, primarily from a small boat (14' w/outboard jet). I also have used all three rivers over the last several years for packrafting, hiking or skiing in from Turnagain Pass or Winter Creek, or from the highway in the case of Portage and floating out, sometimes fishing or hunting along the way. I would like to see at least 20-mile remain open to personal use with motorized boats. I would suggest that additional commercial jetboat operations would be dangerous, as during silver season the river is already pretty dangerous with the volume of boats and speed that some boats ascend and descend the river, including the commercial operations.

Thanks,
Chris Seaman
Anchorage

Dear Mr. Clark,

I would like to thank the Forest Service for looking into the usage of the **Three Rivers Area in the Chugach Forest**.

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My family has been going to the Portage Creek area since the early 1960s. We have seen A LOT of changes! Some greatly appreciated (Portage information center, new campgrounds, viewing sites, trails, etc). Some very concerning.

Primarily, we are all are simply hikers, wildlife viewers, birders, with a little fishing on the side.

We camp several times a year along the Portage Creek. We love this beautiful, wild creek, it has to be one of the prettiest creeks you can drive to in Alaska. A very special place and a wonderful opportunity to watch salmon spawning.

We would really like to see this creek stay wild looking, clean, and beautiful. Yet, increasingly we find garbage and even human excrement in areas that have traditional wayside places for fishing or camping. I do not want these areas closed, but more educational signs could be put up. Is there a possible way to get another campground in this area, perhaps a primitive one with just an outhouse.

We have never boated the other two creeks, primarily we stop along there to watch for wildlife and birds. We also look for salmon in the other rivers. We used to see moose along here all the time, now we never do.

Overview:

This region is a unique experience in Alaska (and the World I would argue). This interesting vast tidal, mudflat ecosystem with the Turnagain Arm, bore tides, and rivers flowing out of glaciated mountains – where else do you see this in the state, or the world?

The ecological importance of this region cannot be understated. It is Extraordinary and Unique. There is no other place like it, period.

Here are my main concerns and management suggestions for the whole area:

1) ATV use: this needs to be seriously limited in this region.

These are wild rivers whose banks are extremely tenuous and fragile (and sometimes very dangerous!) I honestly do not know how much of this goes on since I am extremely cautious about wandering around these muddy banks, but I know this is an increasing concern around Anchorage generally, as well as other areas.

2) Appreciate the input and concerns of ALL resource users, including birders and wildlife watchers.

Give their comments as much weight as the fishers, there are more of us out there than you think...and we bring a lot of money to the state. Wildlife and bird viewers have just as much right to “use” these areas as others who do more impactful things like fish, windsail, and boat. And the whole point of watching wildlife is to watch it....not look at garbage and human waste.

3) Windsurfing/sailing.

- They leave garbage and human waste. What happens when they lose a sail or other paraphernalia? Are they required to get it somehow? There is no way to get a boat into the Turnagain Arm....how do they collect lost items? Are the beluga going to get caught up in lost gear?
- Beluga: I would like to know if these people have any impacts on beluga. The whales ride the bore tides as well and they follow the salmon and hooligan runs. I would like to make sure that humans are not impacting the beluga.
-
- Sooo Dangerous: Make sure there are signs up so when someone finally dies the state is not sued...they have a right to be suicidal, but we shouldn't have to pay out to their families when they sue us for not telling them they shouldn't be doing this. And charge them when they get stuck in the mud and we have to use state resources to pull them out.

4) Fishing

All the things that go along with this sport effect this area as well. Waste, lost line, human waste, salmon remains piling up on banks, interaction with wildlife (bears), lures and line left all over beaches, camping areas trashed...etc etc. You would think that these people would have an interest in maintaining their favorite places, but after 40 some odd years here that this is truly wishful thinking.

5) Commercial Use:

Like all areas, money wins out over rational thinking and care about others and place. See below. All the impacts above are magnified when an area becomes a commercial hot spot.

6) Camping.

More outhouses, what more is there to say? More signs, more education. Portage is a great example...If this area is truly becoming that used, lets make it a special place like Portage. I hate to see the whole region become "less wild" but if that is what it takes to protect it. I am for it. Some of the pull-offs need "no-tent camping" signs, this would prevent some human waste issues.

7) Overuse

This is an extraordinary ecological area. It is biologically unique. Are we losing something irreplaceable in exchange for short-term thrills for a few? I didn't agree with putting salmon in Bird Creek and my guess is there are some wildlife managers who are regretting doing that. The NF should think long-term and seriously about allowing this area to become more of a destination. Loss of critical habitat for birds and wildlife, loss of character of a place, loss of pristine qualities including water quality and refuse, loss of tourism elements, and all the costs associated with that. What are we giving up?

Management Goals:

A) Maintain the Beauty and Wild Appearance:

Because the train goes through here, it means this region is a valuable viewing area for our important tourism companies. Specially with the Whistle Stop now, this area should feel wild and look that way when one steps off the train (except for the outhouses, which I hope will be going in at the Whistle Stops).

B) Educate Users on Dangers of Area:

First I cannot believe the stupidity of some people and can only guess that they really do not know better. Our mudflats in the entire Anchorage basin can be dangerous. It is not that hard to get stuck in them. There should be more signs about this. **Signs**

C) Educate Users on Fragility and Biological Importance of the Region:

- People who know the uniqueness and special qualities of an area are more likely to protect it.
- Appeal to the impactful users (boaters, windsailers, fishers) about why refuse and human waste is not in their own interest. (Fishers mostly should appreciate this...)
- **Provide historical sign-posts, educational areas, extend what was done along the road along the Arm here, boardwalk into marsh (for us birders, there's a lot of us BTW)**

D) Limit Commercial Use; charge fees.

E) Limit or Prohibit ATV Use

F) Educate Fishers on Why Human Waste and Garbage is not good for them.

G) Provide Permits for Windsailing/surfing:

Like Denali, a permit would require them sign something that admits the dangers of what they are doing and pays a fee for rescue and cleanup.

H) Limit Use/ Permits for Boats

Every heavily used River comes to this point. Perhaps that time is now. Not sure. How much gas and oil are getting in? How much junk is going in the Rivers?

I) Overall limit use

J) Place Ecology and Biology above Human Use

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In Sum, I would like to see these Rivers stay wild. This is a fragile, unique area. It need to be protected not turned into to some recreational haven for people who really do not care that much about it but are just out for fish or a thrill.

The area is also part of the whole appeal of the Kenai, an important resource for those in the tourism industry. People take the train to Seward in part to see all the extraordinary sights along the way...and people drive RVs and go on trips down the Kenai looking forward the beauty in this region.

Thank you for caring about this extraordinary area.

Elise Wolf

Dear Paul Clark,

Thank you for asking for my input for the 3 rivers area.

I mostly use the Placer River from Aug to the first week in Sept. I'm fishing for silver salmon during that time period. There are times that I put the boat in a run the river just looking around before and after those dates. I make one or two trips to Spencer Lake to look at the ice but mostly I don't go above Luebner Lake. When I head to Spencer Lake, I leave before 1:00 PM so we don't spoil any wilderness experience for the tourist doing the rafting thing.

When the rafting folks first started doing trips they were a big pain. They would come down and just take over what ever area they wanted to fish with no regard to the people that were already fishing that area. That was the first year and I have not had the same experience since, so as of now I don't have a problem with the rafting company.

There seems to be more people fishing the Placer now and the vegetation gets beaten down in some spots but mostly it is still a wilderness experience.

I would be glad to answer any questions that you might have about the Placer river area.

Thanks again,
Gary

PO Box 662
Girdwood AK 99587
May 26, 2009

Glacier Ranger District
Chugach National Forest

Dear Mr Clark,

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Thank you for the opportunity to comment on use of the Three Rivers of upper Turnagain Arm. We hope you will incorporate our comments into your planning process.

How we use these rivers

We are long time Girdwood valley residents who have been using Twentymile and Placer Rivers valleys for over twenty years for year-round non-motorized recreation, foraging and wildlife viewing. We use Portage valley less frequently. We are also writing on behalf of our daughter, who has used the areas for the seven years since her birth.

During late fall and early winter, we frequently ice-skate on frozen the ponds and wetlands adjacent to both sides of the Twentymile, skating as much as three miles up the valley from the railroad tracks when conditions permit. We ski (diagonal stride/skate-ski) all over the snow covered valleys, sometimes as far as Carmen and Twentymile lakes and Spencer glacier. We paddle/float the Twentymile system (using tidal water/lining to go upstream) including Glacier River and upper Twentymile as far as three miles upstream from the Glacier River confluence. Sometimes we paddle or ice skate in the wetlands associated with Placer River/Ingram creek and the ponds in Portage valley. We have fished in these rivers and harvested plants for food and medicinal purposes. We walk along the riverbanks and through the wetlands associated with Twentymile and Placer Rivers year round. We bird, plant-spot, and view fish and wildlife there frequently: often at least once every week.

One of our favorite activities used to be late-season skate-skiing to Spencer Glacier, Skookum Glacier and up Twentymile as far as Carmen and Twentymile Lakes. However, the increase in snowmobile traffic in recent years has made those activities unpleasant and dangerous, effectively displacing us. Even when few snowmachines are present, it is no longer possible to find a route that is not too tracked-up for safe skate-skiing.

In Portage Valley, we sometimes ski up Bear Valley, or across Portage lake up the slopes to Divide Lake. Occasionally, we ice-skate on ponds, or practice kayak skills there.

Amount and types of recreation we feel are appropriate

We feel that though some motorized use of these valleys is appropriate, the current unregulated use is too high. Wildlife as well as non-motorized recreationists had historically shared the valley with a few snow machine and motorboat riders, using their machines to access the same areas of the valley that we did. Around 1998/1999, however, a dramatic increase occurred in the quantity of motorized winter use of these valleys. The increased traffic, as well as the introduction of a new style of snow-mobile riding, and the start of commercial helicopter skiing operations, has had a significant negative effect on the quality of the river valley environment. In some winters, the level of snow mobile and helicopter skiing traffic has been so high that we have been displaced from the valleys entirely. The personal impact of this sudden change to one of our favorite areas was devastating. Though use levels have dropped the past few years, due to weather patterns and low snow cover, the Forest Service's attempt to manage winter motorized recreation has been ineffective. Snow machine riders in particular do not stick to the designated corridor in Twentymile Valley, racing their machines all over the valley. Some riders even ignore closed periods during low snow cover, and common sense ecological practices: we have observed snow machine tracks crossing open water, driving across obvious salmon spawning habitat. The high level of use, and the practice of racing machines across the valley at speeds exceeding 60 miles per hour is not appropriate. Moose and wolves that we used to see frequently on our ski expeditions have disappeared, presumably becoming nocturnal in order to avoid the disturbance.

Air boats on the river poses a problem because of the noise level. We personally feel this type of motor-craft should be banned from the river. We have observed startled moose running for cover as much as a mile away from the river when an airboat passes. Airboats can't be good for wildlife, and the noise level violates healthy standards for human ears; it's not what people get out on the land to experience. Jet boats on the rivers pose different problems. Their speed makes them dangerous to non-motorized boaters rounding the blind curves, especially in the narrow and sweeper-choked channels of the upper Twentymile and Glacier Rivers. Big, fast boats make wakes that create obvious bank erosion. Every time a jet boat passes, silt pours into the river when the wake hits the banks; we have observed this phenomenon directly.

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In the past several years, the commercial jet boat operator has been putting a chain across the road that we have used for over 20 years to launch our kayak at Twentymile. This is an issue we would like to see addressed. We recognize that the railroad, not the Forest Service, manages the road, but the Forest Service awarded the commercial use permit associated with this loss of public river access, and the highway parking area/boat launch is not safe for non motorized boat launching.

Activities we would/would not like to see

We would like to see more attention to the protecting the incredible natural resources of these valleys before any more motorized use is permitted. We specifically do not want more commercial motorized use of valleys, whether snowmobile tours, helicopter hiking, helicopter skiing, or motorboat tours. We specifically would not like to see helicopter hiking introduced. We recognize that there is an interest in using the railroad access to develop more activities at Spencer Glacier and Grandview. If that occurs, then it is even more important that the Twentymile Valley be managed for low-impact use to offset the loss of opportunities for quiet quasi-wilderness use of the Placer River Valley. Given that Portage Valley has a highway, and Placer has the railroad, it is essential that the Twentymile Valley remain roadless and undeveloped.

Safety and natural resource issues to consider

We would like to see the Forest Service start monitoring and enforcing the designated winter closures in the Twentymile Valley. We would like to see the issue of bank erosion by motorboats addressed. During the eulachon spawning period in May and early June in particular we would like to see a limit on weight and power of motorboats considered. The eulachon (hooligan) fishery is hugely popular, and the fish are important food for endangered Beluga whales, as well as for the dozens of bald eagles that congregate in the Twentymile during the run. It would be tragic if the careless management of the river led to a loss of this wonderful resource.

We would like to see quiet recognized as a valuable and threatened natural resource. Access to quiet recreation in local low-elevation valleys has been almost completely taken away from us. We would like to see the Forest Service study the effect of disturbance created by some motorized recreation activities on moose, wolves, and other wildlife of the three valleys, although we recognize that the failure to conduct a baseline evaluation before the disturbance occurred limits such a study.

The area provides a valuable resource for swan staging. We regularly observe migrating swans using the area lakes/ponds; some years we have observed a pair of swans nesting area in Placer/Ingram creek drainage

The area provides important eagle nesting habitat; we regularly observe active eagle nests. This resource should be protected, including limiting noise disturbance during nesting season.

Twentymile valley provides important moose and wolf habitat. We have observed a pack of wolves in winter, and regularly observe wolf tracks in certain locations in the valley. This resource should be protected.

Thank you again for the opportunity to comment.

Matt Berman

Gabrielle Barnett

Naomi Berman

Paul,

I missed Wednesday's meeting (out of town). Will there be another opportunity to share ideas on managing human activity on these river systems?

As a kayaker, photographer and wildlife watcher, I am interested in preserving the peace and quiet of these areas. Heavy boat traffic, ATV use, and gun fire are conflicting activities with those of us who share the sense of "wilderness in preservation of the world."

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Hopefully, your agency is beginning to endorse the scientific community's concerns about the effects of global warming and is starting to recast its management approach. Federal forest managers need to begin CLOSING areas to motorized use, rather than opening new ones.

There is now another threat: increasing jet-ski activity.

Sorry, but you'll have to start acting like the parent who needs to tell his consumption-addicted child, "NO MORE!"

--Soren Wuerth

Paul,

Thank you for letting me know about your meeting. I appreciated the opportunity to attend.

As I mentioned in my written comments, our primary concern is trespass especially in the Twenty Mile River access area. We have some grave concerns in the area and want to sit down with you and see if we can develop some protocols that may be helpful to both of us.

In that light, one of the public comments made at the meeting had to do with the river access at Twenty Mile. A couple folks suggested this area was an excellent ingress/egress point for kayak's, pack raft, etc. except that the jet boats are creating a problem. There was a little grumbling about the exclusive permit they appear to have. This is to let you know the ARR is in the process of pulling the permit from the jet boat operator because of lack of financial performance.

We would like to explore with you to see if this presents an opportunity for the Forest Service to permit the area as part of the 3 Rivers Management Plan. This may be beneficial to both of us. There may be a number of benefits which could accrue to the Service.

By the way, another comment was somewhat humorous ... just to let you know, we do not have federal marshall's patrolling our track. We do have our own security department, but we are certainly not federal !

Please let me know if you would like to discuss further.

Thank you

Bruce Carr
Dir., Strategic Planning

Thank you for the informational meeting last Wednesday.

In your comments, you mentioned that 20 Mile is under the Scenic River Management Prescription, which should include "good opportunities for solitude, isolation, and quiet when traveling on the river." For that reason, I suggest that no air boats nor jet skis be allowed on the river. I would also suggest that there be no increase in the commercial capacity for the river. Use of the river has very significantly increased in the ten or so years that I have frequented it. Commercial

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boaters tend to use the river daily, while recreational boaters are more occasional users.

As for Portage River, I would agree with the gentleman at the meeting who suggested that this river be limited to non-motorized use. If there are repercussions from land owners on the river, maybe they could have some sort of "grandfather rights" and receive a special permit for use of motorized boats to transport goods to their properties.

Please keep us informed about future meetings.

Thank you,
Betsy Connell

Thanks, Paul for the information. I would like to participate and will review the information and try to comment before the meeting.
Carol [Sanner]